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Attorney for Plaintiff, Demetrious Polychron

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

DEMETRIOUS POLYCHRON

Plaintiff,

vs.

JEFF BEZOS, et al.,

Defendants.

Case No.: 2:23-cv-02831-SVW-E

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
HEARING ON MOTION FOR
ATTORNEYS' FEES**

Date: October 16, 2023

Time: 1:30 p.m.

Dept.: 10A

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff hereby moves this Court for an order continuing the hearing on Defendants' Motion for Attorneys' Fees currently set on October 16, 2023, at 1:30 p.m.

This motion is based on this notice of motion, the declaration of Katie Charleston, and all other matters of which this Court may take judicial notice, the pleadings, files, and records in this action, and on any argument heard by this Court.

This notice is made following the undersigned's request for stipulation to continue sent to Defendants' counsel on September 20, 2023.

Dated: September 22, 2023

Respectfully submitted,

Katie Charleston Law, PC

By: /s/ Katie Charleston

Katie Charleston, Esq.

1 Katie Charleston, of Katie Charleston Law, PC, respectfully requests the Court
2 continue the hearing on Defendants' Motion for Attorneys' Fees currently set on October
3 16, 2023, at 1:30 p.m., and in support thereof states:

4 1. On August 31, 2023, the undersigned filed a motion to withdraw from this
5 matter due to the breakdown of the attorney-client relationship and the failure of the
6 Plaintiff to make payments for services rendered, thereby causing a financial hardship.
7 (Katie Charleston Decl. at ¶ 2, filed contemporaneously herewith).

8 2. To date, the Court has not issued an order. The Motion remains set for hearing
9 on October 2, 2023. (Charleston Decl. at ¶ 3).

10 3. On September 8, 2023, Defense counsel filed their motion for attorneys' fees,
11 currently set for October 16, 2023. (Charleston Decl. at ¶ 4).

12 4. Plaintiff's opposition to this motion is due on September 25, 2023.
13 (Charleston Decl. at ¶ 5).

14 5. The undersigned seeks a continuance on the hearing as set and the Plaintiff's
15 time to respond for 30 days, following the Court's ruling on the undersigned's motion to
16 withdraw. (Charleston Decl. at ¶ 6).

17 6. The undersigned cannot continue to represent the interests of Plaintiff due to
18 the breakdown of the attorney-client relationship and the financial hardship that Plaintiff's
19 counsel has and will continue to suffer in further representation. (Charleston Decl. at ¶ 7).

20 7. The undersigned seeks to protect the Plaintiff's interests and his ability to
21 defend the filed motion pro se or with the assistance of another attorney. (Charleston Decl.
22 at ¶ 8).

23 8. Defendants counsel was contacted regarding this continuance, and they have
24 no objection. (Charleston Decl. at ¶ 9).

25 9. For these reasons, the undersigned requests a continuance of the hearing on
26 the Defendants' Motion for Attorney fees and the Plaintiff's time to respond. (Charleston
27 Decl. at ¶ 10).

1 WHEREFORE, Katie Charleston respectfully requests the Court enter an order
2 continuing the hearing on Defendants' Motion for Attorneys' Fees, and for all other
3 proper relief.

4 Dated: September 22, 2023

Respectfully submitted,
Katie Charleston Law, PC

7 By: /s/ Katie Charleston
8 Katie Charleston, Esq.